

D★A★R

c o m m u n i c a t i o n s

Dear Sir, Madam,

We send you this letter in response to the proposed legislation by the FCC for the prevention of cramming.


We too feel it is important to protect consumers from phone bill cramming. However, the proposed rulemaking as it is today, will kill not just the bad apples, but also business that is vital for low budget consumers.

DAR communications (DAR) make use of a dial around code (e.g. 1010229) which is billed through our partner BSG. DAR is specialized in providing long distance calls at the lowest rates. DAR operates in a niche market, where both budgets as margins are low. Users are usually composed of minorities, who have family abroad. DAR's services give them the opportunity to stay in contact with family and friends abroad at very low rates.

Every customer has to use the dial around code, in order to be able to use this service. So with every call a customer wishes to make, he/she needs to consciously choose to dial the dial around number. DAR feels that this 'conscious decision', constitutes as 'opt-in' for the usage of the DAR services. Also, at the beginning of every call, the customer gets notified over the line, what the cost is for using the service. This notification is free of charge. So the customer can hang up, before a charge is generated. Since DAR works with low margins as it is, this service could not be run, if additional processes would be added by law.

DAR feels that the rulemaking should reflect this issue and make sure to not harm low budget consumers, by eliminating the dial around service.

Respectfully,



Ralph P. Fasi, CEO
DAR communications